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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BRENNA SCHRADER, an individual, on
behalf of herself and all others similarly
situated,

Plaintiff,

vs.

STEPHEN ALAN WYNN; an individual;
MAURICE WOODEN, an individual, WYNN
LAS VEGAS, LLC dba WYNN LAS VEGAS
a Nevada Limited Liability, WYNN
RESORTS, LTD, a Nevada Limited Liability
Company; and DOES 1-20, inclusive; ROE
CORPORATIONS 1-20, inclusive,

Defendants.

Case No. 2:19-cv-02159-JCM-BNW

**STIPULATION TO EXTEND
DEADLINE FOR PLAINTIFF TO FILE
A RESPONSE TO DEFENDANTS'
MOTIONS TO DISMISS, MOTION
FOR MORE DEFINITE STATEMENT
AND MOTION TO STAY
DISCOVERY; AND TO SET DATE
FOR DEFENDANTS' REPLIES**

**(THIRD REQUEST – Response to
Motion to Dismiss, Motion for a More
Definite Statement and Motion to Stay
Discovery)**

**(FIRST REQUEST – Defendants Replies
to Plaintiff's Responses to Motions to
Dismiss, Motion for More Definite
Statement, and Motion to Stay Discovery)**

IT IS HEREBY STIPULATED by and between Plaintiff, Brenna Schrader, ("Plaintiff"),
through her counsel Burke Huber, at the Richard Harris Law Firm, and Defendants, Wynn Las
Vegas, LLC ("Defendant Wynn, LLC") and Wynn Resorts, Ltd. ("Defendant Resorts"), through
their counsel Jackson Lewis P.C., Defendant, Stephen Alan Wynn ("Mr. Wynn"), through his
counsel Peterson Baker, PLLC, and Defendant, Maurice Wooden ("Mr. Wooden"), by and
through his counsel Kennedy & Couvillier, (collectively "Defendants"), that Plaintiff shall have

1 an extension to May 8, 2020 to file a response to all pending motions, and Defendants shall file
2 replies to Plaintiff's responses to all pending motions on May 22, 2020.

3 This Stipulation is submitted and based upon the following:

4 1. On March 6, 2020, Defendant Wynn, LLC filed a Motion to Dismiss [ECF No. 35]
5 to which Defendant Resorts filed a Joinder [ECF No. 37]; Defendant Resorts filed a Motion to
6 Dismiss [ECF No. 36]; Mr. Wynn filed a Motion to Dismiss [ECF No. 39]; and Mr. Wooden
7 filed a motion for a more definite statement [ECF No. 33.]

8 2. In addition, Defendant Wynn, LLC and Defendant Resorts, filed a Motion to Stay
9 Discovery [ECF No. 38], to which Mr. Wynn and Mr. Wooden each filed a Joinder [ECF Nos. 40,
10 42].

11 3. Previously, on April 6, 2020, the parties stipulated to allow Plaintiff a 21-day
12 extension to file a response by May 1, 2020 to Defendants' motions as listed above.

13 4. Due to the complexity of the motions filed and the current complications made by
14 the Coronavirus, Covid19, the parties respectfully request the Court grant Plaintiff an additional
15 7-day extension up to and including May 8, 2020 to file a response to Defendants' motions.

16 5. In anticipation of potential Coronavirus obstacles and to avoid the need of filing an
17 additional stipulation, the parties also stipulate the Defendants' Replies to Plaintiff's responses to
18 the pending motions will be due two weeks later, on May 22, 2020.

19 6. This is the third request for an extension of time for Plaintiff to file a response to
20 Defendants' motions.

21 7. This is the first stipulation related to Defendants' replies.

22 8. This request is made in good faith and not for the purpose of delay.

23 9. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed
24 as waiving any claim and/or defense held by any party.

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1 Dated this 28th day of April, 2020.

2 RICHARD HARRIS LAW FIRM

JACKSON LEWIS P.C.

3 /s/ Burke Huber

/s/ Deverie J. Christensen

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10 *Brenna Schrader*

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Attorneys for Defendants
Wynn Las Vegas, LLC and Wynn Resorts,
Ltd.

9 KENNEDY & COUVILLIER

PETERSON BAKER, PLLC

11 /s/ Maximiliano Couvillier

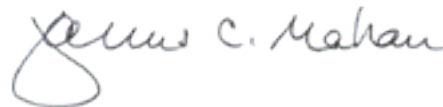
/s/ Nikki Baker

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13 3271 E. Warm Springs Road
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15 *Attorney for Defendant*
16 *Maurice Wooden*

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Las Vegas, Nevada 89101
Attorney for Defendant
Stephen Alan Wynn

17 **ORDER**

18 IT IS SO ORDERED:

19
20 

21 UNITED STATES DISTRICT JUDGE

22
23 Dated: April 29, 2020
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